

ENFORCEMENT OF EPA DRINKING WATER CERTIFICATION MANUAL

Kentucky Division of Water (DOW) regulates drinking water certified laboratories by regulation, specifically 401 KAR 8:040 which incorporates by reference the EPA Manual for the Certification of Laboratories Analyzing Drinking Water; Criteria and Procedures Quality Assurance, 5th Edition (EPA 815-R-05-004), January 2005 (EPA Manual).

The preface to the EPA Manual states: “Generally the term “must” in this manual refers to elements that are required by the National Primary Drinking Water Regulations or the approved drinking water methods. This manual uses the term “should” to describe criteria and procedures that in OW’s [EPA Office of Water’s] judgment are necessary for laboratories to produce data that are scientifically valid and defensible, and are of known precision and accuracy.” In the case that DOW finds a “should” item in the EPA Manual to be absolutely necessary, then the item will be enforced as a requirement and will result in a deviation if not adhered to by the laboratory.

Kentucky’s drinking water laboratory certification regulation, 401 KAR 8:040 states in Section 5: “Deviations. (1) Deviation from accepted practice specified in the Manual for the Certification of Laboratories Analyzing Drinking Water; Criteria and Procedures Quality Assurance listed on a report resulting from an on-site inspection, shall be corrected. (2) A written explanation of the deviation and action taken to correct it shall be submitted to the cabinet within thirty (30) days of the issuance of the inspection report.”

DOW interprets the above language clarification as a requirement for drinking water laboratories who wish to become certified or to maintain their certification.